
ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING (AML/CTF) POLICY

Wise Global B.V. – B2B Operations

Effective Date: July 1, 2025 | Review Date: July 1, 2026

1. POLICY STATEMENT

Wise Global B.V. is committed to full compliance with the laws and regulations of Curaçao relating to Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF), including the CGA AML Policy (Jan 2025), National Ordinance Identification when rendering Services (NOIS), the National Ordinance Reporting Unusual Transactions (NORUT), and other applicable local and international obligations. As a B2B gaming service provider, Wise Global B.V. does not engage with natural persons as clients. Its AML/CTF responsibilities center on ensuring that its corporate clients are legitimate, low-risk entities and not vehicles for money laundering or terrorism financing.

2. PURPOSE

The purpose of this policy is to ensure a consistent and risk-based approach to the detection, prevention, and reporting of ML/TF activities across all Wise Global B.V. business operations. It provides internal guidance and establishes minimum standards aligned with Curaçao's AML framework for B2B gaming operations.

3. AUDIENCE

This policy applies to all employees, officers, consultants, third-party agents, and board members of Wise Global B.V. engaged in compliance, client onboarding, and business operations.

4. DEFINITIONS

Money Laundering (ML), Terrorist Financing (TF), Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), Politically Exposed Person (PEP), Ultimate Beneficial Owner (UBO), Suspicious Transaction Report (STR), Business Risk Assessment (BRA), Customer Risk Assessment (CRA), and Compliance Officer (CO).

5. POLICY IMPLEMENTATION

5.1 BUSINESS RISK ASSESSMENT

Wise Global B.V. conducts an annual Business Risk Assessment (BRA) to identify ML/TF exposure based on its service offerings, geographic markets, client sectors, and ownership structures. This assessment informs the company's internal controls, training needs, and monitoring systems.

5.2 CUSTOMER RISK ASSESSMENT

Wise Global B.V. performs risk assessments on corporate clients to determine their ML/TF exposure. Risk factors include jurisdiction, legal structure, beneficial ownership complexity, and regulatory history.

5.3 CUSTOMER ACCEPTANCE POLICY

Wise Global B.V. only accepts corporate clients that are properly incorporated, licensed (if applicable), and have transparent ownership structures. Relationships with shell companies, unregulated financial service providers, or clients from high-risk countries are subject to EDD or declined outright.

5.4 CUSTOMER DUE DILIGENCE (CDD)

CDD procedures include collection and verification of incorporation documents, UBO identification, PEP and sanctions screening, and regulatory license validation (where applicable). All CDD documentation is retained for a minimum of five years. Where verification cannot be completed, the relationship will not be initiated or will be terminated.

5.5 ONGOING MONITORING

Corporate clients are monitored on an ongoing basis using a risk-based approach. Monitoring focuses on changes in ownership, jurisdiction, service usage patterns, or reputational alerts.

5.6 RELIANCE ON THIRD PARTIES

Wise Global B.V. may accept CDD conducted by regulated third parties, provided there is a formal agreement in place, and access to all documents is guaranteed. The company retains ultimate responsibility for client due diligence.

5.7 REPORTING OF UNUSUAL TRANSACTIONS

Employees must report suspicious transactions or activities to the MLRO. The MLRO assesses reports and determines whether an STR should be submitted to the FIU Curaçao.

5.8 AML COMPLIANCE PROGRAM

Wise Global B.V.'s AML program is designed to reflect its B2B business model, ensuring controls are proportionate to the risks posed by corporate counterparties. The program is reviewed annually and includes procedures for freezing transactions, blacklisting high-risk clients, and documenting internal decisions.

6. COMPLIANCE AND CONSEQUENCES OF NON-COMPLIANCE

Violations of this policy can result in disciplinary measures, regulatory sanctions, legal proceedings, and reputational damage to the company. Compliance is monitored by the MLRO and audited annually.

7. RELATED INFORMATION

CGA AML Policy (2025), NOIS, NORUT, FIU Guidelines, EU AML Directives, FATF Recommendations.

8. CONTACT INFORMATION

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9. POLICY HISTORY

This is the first version of the AML/CTF Policy for Wise Global B.V., effective July 1, 2025.

10. POLICY URL

Only available offline

11. AML/CTF GOVERNANCE FOR B2B OPERATIONS

11.1 ROLE OF THE MLRO

The Money Laundering Reporting Officer (MLRO) is appointed by the Board of Directors and is responsible for overseeing the effective implementation of this policy. The MLRO must operate independently, with direct access to senior management and the Board. The MLRO is responsible for:

- Receiving and reviewing internal reports of unusual or suspicious activity;
- Filing STRs with the FIU Curaçao;
- Monitoring regulatory developments and updating the AML policy accordingly;
- Ensuring regular training and compliance awareness across the company.

11.2 INDEPENDENT AUDIT

In compliance with CGA AML Policy (Jan 2025), Wise Global B.V. commissions an independent AML audit at least annually. This review evaluates the adequacy of AML controls, the performance of the MLRO, compliance with STR requirements, and adherence to internal procedures. Findings are submitted to the Board, and corrective actions are tracked until resolution.

11.3 CORPORATE CLIENT SCREENING PROCEDURES

All potential corporate clients must undergo a multi-layered screening process prior to account onboarding. This includes:

- Verification of legal incorporation and regulatory status;
- Identification and verification of UBOs and senior managers;
- Adverse media screening using international databases;
- Sanctions screening against UN, EU, OFAC, and Kingdom of the Netherlands lists;
- PEP identification and EDD if required.

11.4 ENHANCED DUE DILIGENCE (EDD)

EDD measures are applied to clients:

- Incorporated in or operating from high-risk jurisdictions;
- With complex or opaque ownership structures;
- Identified as PEP-related or under regulatory scrutiny.

EDD includes validation of source of funds, enhanced ownership vetting, and Board-level approval before onboarding.

11.5 TRANSACTIONAL DUE DILIGENCE

Although Wise Global B.V. does not process individual end-user transactions, it monitors financial flows to and from client accounts. Any unusual patterns—such as high volume of inbound payments from unrelated parties or unexplained payment activity—are flagged for MLRO review. Payment service providers used by clients must be reputable and regulated.

11.6 RISK CATEGORIZATION OF CORPORATE CLIENTS

Clients are rated based on jurisdictional, structural, reputational, and behavioral risk factors. Risk categories are used to determine:

- The depth of CDD or EDD procedures;

- Frequency of ongoing review;
- Monitoring thresholds and reporting triggers.

11.7 TRAINING AND AWARENESS PROGRAM

All staff involved in compliance, business development, finance, and executive decision-making receive annual AML training. Training covers:

- Identification of red flags in B2B onboarding and operations;
- Escalation protocols and MLRO access;
- Legal and reputational consequences of non-compliance.

Training completion is documented and reviewed by the MLRO.

11.8 DOCUMENTATION AND RETENTION

Wise Global B.V. maintains complete CDD files for every client for a period of no less than five (5) years after the end of the business relationship. This includes:

- Corporate registration documents;
- Proof of UBO identities and roles;
- Copies of contracts, license certificates, and correspondence;
- STR filings and internal notes or reviews.

All documentation is stored securely in encrypted form and is accessible to regulators upon lawful request.